

October 5, 2000

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BY HAND

Magalie R. Salas, Esq.
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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NEW YORK NY 10022-2585

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NEWARK NJ 07102-5397

101 SOUTH TRYON STREET
CHARLOTTE NC 28280-0008

SPECIAL COUNSEL
LEE W. SHUBERT
(202) 216-4695

CLIENT NO. 43209-84829

Re: Amendment of Section 73.202(b) of the Table of Allot-
ments for **RANGELY, RIDGWAY, SILVERTON,**
COLORADO

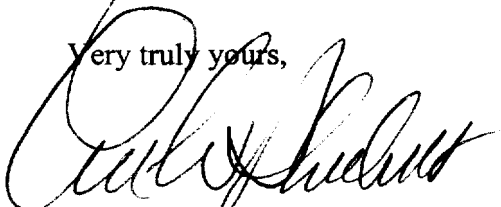
MM Docket No. 99-151; RM 9559

Dear Ms. Salas:

Transmitted herewith, on behalf of **IDAHO BROADCASTING CONSORTIUM, INC. ("IBC")**, and in ref-
erence to the above-referenced rulemaking proceeding is an original and four (4) copies of IBC's
"SECOND DISCLOSURE STATEMENT."

Should further information be desired in connection with this matter, kindly communicate directly
with this office.

Very truly yours,


Lee W. Shubert

Enclosures (5)

cc(w/1 enc.): Mr. Frederic W. Constant
Mr. Melvyn Lieberman
As per the Certificate of Service

LWS/dml

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

OCT 5 2000

In the Matter of)
)
Amendment of Section 73.202(b),)
Table of Allotments,)
FM Broadcast Stations)
(Rangely, Colorado))

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

MM Docket No. 99-151
RM-9559

TO: Chief, Allocations Branch
Mass Media Bureau

SECOND DISCLOSURE STATEMENT

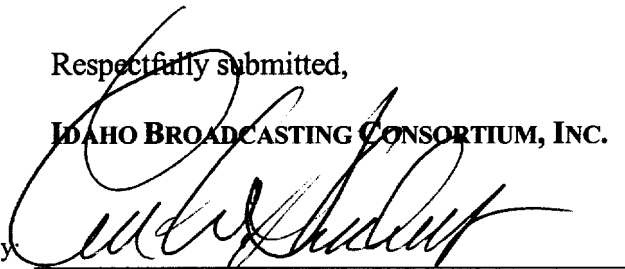
IDAHO BROADCASTING CONSORTIUM ("IBC"), by its attorneys and consistent with Section 1.1204 the Commission's Rules, hereby respectfully submits a copy of memo that was electronically communications to the Mass Media Bureau staff on or about September 14, 2000, by or on behalf of IBC respecting the proposed FM channel allotments for Rangely, Ridgway and Silverton, Colorado, in connection with the above-captioned proceeding. *See, Attachment A.*

This submission is being filed to ensure a complete record for all parties in connection with the above-captioned proceeding.

Respectfully submitted,

IDAHO BROADCASTING CONSORTIUM, INC.

By



Lee W. Shubert
Its Attorneys

ROSENMAN & COLIN LLP
805 15TH Street, N.W. 9th Floor
Washington, D.C. 20005-2202
Tel: 202-216-4600; Fax: 202-216-4700

Dated: October 5, 2000


CERTIFICATE OF SERVICE

The undersigned, an employee of **ROSENMAN & COLIN, LLP**, hereby certifies that the foregoing **SECOND DISCLOSURE STATEMENT**, respecting MM Docket No. 99-151, on behalf of **IDAHO BROADCASTING CONSORTIUM, INC.**, was mailed or hand delivered* this date by First Class U.S. Mail, postage prepaid, to the following:

Mountain West Broadcasting
c/o Victor A. Michael, President
6807 Foxglove Drive
Cheyenne, WY 82009

*John A. Karousos
Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau
Federal Communications Commission
445 Twelfth Street, S.W., Room 3-A266
Washington, DC 20554

*Andrew Rhodes, Esq.
Policy and Rules Division
Mass Media Bureau
Federal Communications Commission
445 Twelfth Street, S.W., Room 2-C261
Washington, DC 20554

By: 
Dolly LaFuente

October 5, 2000

IDAHO BROADCASTING CONSORTIUM, INC.
SECOND DISCLOSURE STATEMENT

ATTACHMENT A

To: Roy Stewart, Esq., Chief, Mass Media Bureau

From: Mary F. Constant

Date: September 14, 2000

RE: A REQUEST FOR FURTHER ASSISTANCE

First, thank you for meeting with us August seventh. I know that you went to great effort to gather your staff. We appreciate your graciousness and assistance.

As you will recall, we discussed five matters. Four of them are still outstanding.

1. Grape Radio/KRAZ (Santa Ynez, California) – 301

Only about ninety (90) construction days are left until I will lose my construction permit. I am told that it will take at least sixty (60) days to have the directional antenna constructed and installed.

Is it likely that the third adjacent channel issue will be resolved during the next two weeks?

2. My company, Independent Broadcasting Company, applied for a simple switch of community of license between my two stations (KRSH, Middletown and KGRP, Calistoga, California).

At our meeting, I was informed that there are different standards for community of license coverage in the Allocations and Licensing Divisions.

Specifically, my proposal meets the criteria of the Licensing Division. The proposal solves a difficult relocation problem for KRSH, the current Middletown station.

However, the Allocations Division is concerned because the closest fully spaced site is six kilometers short to Calistoga. There is no problem with the spacing to Middletown.

Would a waiver request be considered, or would it be a waste of time for me and the Commission?

3. My husband Fred did receive a reallocation of Channel 279 to Ridgeway, Colorado.

However, the Allocations Division chose different reference coordinates which are at a remote and unbuildable locations. Because the Allocations Division did not adopt our proposed coordinates for the other new allocation at Rangeley, the existing broadcast sites are precluded, making construction extremely problematic.

Further, the Allocations Division required a 301 to be submitted within 90 days (now 75 days).

4. Finally, at our meeting, we understood that action would be taken on the Petition for Reconsideration filed to move Channel 294 from McCall, Idaho to Victor, Montana.

Our attorney, Lee Shubert, advises that the staff has told him that the Petition cannot be taken out of order and that they cannot provide a target date.

The paperwork you requested was promptly submitted.

Can action be facilitated?

I understand that you will be visiting San Francisco next week. We would welcome the opportunity to visit with you again, if your busy schedule permits.

Again, we all appreciate your personal assistance and thank you.